

**QUARTERLY PROGRESS REPORT  
FOR THE CORRECTIVE MEASURES**

**FIRST QUARTER 2016**

**UTI Corporation  
(now UTI Holdings, LLC (d/b/a Lake Region Medical))**

**Collegeville, PA**

**MAY 2016**

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**ACCELLENT INC.**  
**QUARTERLY PROGRESS REPORT**  
**FOR THE**  
**CORRECTIVE MEASURES IMPLEMENTATION**

**Period:** January 1, 2016 through March 31, 2016.

This Quarterly Progress Report is submitted in compliance with Section VI.D, Paragraph 5 of the Administrative Order on Consent (AOC) between the United States Environmental Protection Agency (USEPA) and UTI Corporation (now Accellent Inc. d.b.a. Lake Region Medical on behalf of UTI Holdings, LLC.), dated 31 March 1992.

**PRINCIPAL ACTIVITIES DURING THIS PERIOD**

**Groundwater Recovery and Monitoring**

Groundwater recovery, pursuant to Section VI.A.2 of the AOC, is continuing. The First Quarter 2016 groundwater sampling event was conducted on 10 and 11 February 2016. The monthly sampling of the air stripper influent and effluent continued in compliance with Section VI.A.3 of the AOC. Figure 1 shows the monitoring wells sampled on a quarterly basis and the monitoring wells to be sampled on an annual basis (fourth quarter).

Samples were also collected from the Collegeville-Trappe Public Works Department (CTPWD) production wells CT-1 and CT-8. Tap water samples were collected from eight residential wells from the area surrounding the site. All groundwater samples were analyzed for trichloroethene (TCE) and 1,1,1-trichloroethane (TCA). The groundwater samples from on-site monitoring well UTM-14 and production well CT-8, were also analyzed for total and hexavalent chromium. Table 1 summarizes the results of the quarterly groundwater quality monitoring for the First Quarter 2016.

Residential supply well RES-2 (Toner) was sampled at two points (pre-treatment and post-treatment) to verify the effectiveness of a carbon filtration system that was installed by Accellent in April 1994. The filtration system was installed at the direction of the USEPA. The post-treatment water supply is fitted with a granular activated carbon (GAC) adsorption treatment system and an ultraviolet (UV) treatment system. Both of these systems are maintained by Accellent.

Neither TCE nor TCA was detected in any of the residential wells sampled during this sampling event at a concentration exceeding the respective Maximum Contaminant Level (MCL) for these compounds.

The routine sampling results summarized in Table 1, fall within the historical monitoring results for the site and continue a general decreasing trend in contaminant concentration that has been evident throughout the site remediation program.

In accordance with the approved final design, Accellent continues to periodically contact the Montgomery County Health Department (MCHD) to determine if new water well permits have been issued for the area of the projected plume. This effort is ongoing to accommodate updating of the off-site water use database, if necessary. To date no new wells within the former projected plume area have been identified through this periodic well permit records search.

The twice-monthly sampling and analysis of Outfall #2 (discharge from the stripping tower) has continued in accordance with Accellent's National Pollutant Discharge Elimination System (NPDES) permit (No. PA0042617). Quarterly samples from Outfall 002 were collected during February 2016.

### **Modification of the Site Remediation/Attainment Monitoring**

The Final Revised Corrective Measures Design was approved by USEPA in a letter to UTI dated 16 May 2001. The implementation of the system expansion at the Accellent facility was completed on 12 August 2002 with the start-up of recovery well UTM-11. The Corrective Measures Implementation Report (CMIR) has been completed and submitted to the USEPA. In accordance with the ACO the Corrective Measures Five Year Assessment Report was submitted to the USEPA during May 2008.

The groundwater extraction system was operated continuously during the First Quarter 2016, except for shutdowns for maintenance or repairs. Secondary recovery well UTM-11 has been pumping continuously at 9 to 13 gallons per minute since the modification (deepening) of this well in September 2015.

On 28 October 2015 Accellent sent a revised Post Remediation Care Plan (PRCP) to the USEPA addressing comments provided by the USEPA on the previous version of the PRCP. A draft Environmental Covenant was included as part of this revised PRCP. The PRCP was approved by the USEPA on November 20, 2015. The Environmental Covenant is currently under review by the USEPA and is expected to be finalized and approved in the near future. The public comment period for the Explanation of Significant Differences published by the USEPA ended on May 6, 2016. There were no public comments on the planned closure of the AOC. Once the Environmental Covenant is finalized, the AOC will be closed and site remedial operations will continue under the PRCP and the Environmental Covenant.

### **Activity Planned for Next Quarter:**

The Second Quarter 2016 routine groundwater sampling will be conducted during May 2016. Because there were no comments on the Explanation of Significant Differences the Second Quarter 2016 groundwater sampling event will be conducted in accordance with the approved PRCP. Sampling of the stripping tower influent and effluent (tank and tower samples) will continue on a monthly basis. The quarterly NPDES effluent sample from Outfall 002 will be collected during May 2016.

The operation of the groundwater remedial system (pumping wells UTM-1 and UTM-11) at the Accellent facility will continue during 2016.

The completion of the Environmental Covenant and the closure of the AOC is expected to be completed during the Second Quarter 2016.

Table 1

**2016 Quarterly Groundwater Sampling Analytical Results;  
UTI Holdings, LLC (d/b/a Lake Region Medical), Collegeville, PA**

WELL #	Feb-15				WELL #	May-16			
	TCE	TCA	TOTAL CR	HEX CR		TCE	TCA	TOTAL CR	HEX CR
UTM-4	11	3.9	NA	NA	UTM-4				NA
UTM-10	2.1	2.3	NA	NA	UTM-10				NA
UTM-14	2	0.46J	5u	10u	UTM-14				10u
UTM-20	1u	1u	NA	NA	UTM-20				NA
UTM-21	1u	1u	NA	NA	UTM-21				NA
UTM-22	NA	NA	NA	NA	UTM-22				NA
GW-RES1-WEN	1u	1u	NA	NA	GW-RES1-WEN				NA
GW-RES2-TON-PRE	1u	1u	NA	NA	GW-RES2-TON-PRE				NA
GW-RES2-TON-POST	1u	1u	NA	NA	GW-RES2-TON-POST				NA
GW-RES3-DET	1u	1u	NA	NA	GW-RES3-DET				NA
GW-RES5-ODO	1u	1u	NA	NA	GW-RES5-ODO				NA
GW-RES9-MUR	1u	1u	NA	NA	GW-RES9-MUR				NA
GW-RES10-SEM	1u	1u	NA	NA	GW-RES10-SEM				NA
GW-RES11-ROS	0.39J	1u	NA	NA	GW-RES11-ROS				NA
GW-RES12-DAY	1u	1u	NA	NA	GW-RES12-DAY				NA
CT-1	0.44J	1u	NA	NA	CT-1				NA
CT-8	0.94J	1u	5u	10u	CT-8				10u

WELL #	Aug-16				WELL #	Nov-16			
	TCE	TCA	TOTAL CR	HEX CR		TCE	TCA	TOTAL CR	HEX CR
UTM-4					UTM-4				NA
UTM-10					UTM-10				NA
UTM-14					UTM-14				10u
UTM-20					UTM-20				NA
UTM-21					UTM-21				NA
UTM-22					UTM-22				NA
GW-RES1-WEN					GW-RES1-WEN				NA
GW-RES2-TON-PRE					GW-RES2-TON-PRE				NA
GW-RES2-TON-POST					GW-RES2-TON-POST				NA
GW-RES3-DET					GW-RES3-DET				NA
GW-RES5-ODO					GW-RES5-ODO				NA
GW-RES9-MUR					GW-RES9-MUR				NA
GW-RES10-SEM					GW-RES10-SEM				NA
GW-RES11-ROS					GW-RES11-ROS				NA
GW-RES12-DAY					GW-RES12-DAY				NA
CT-1					CT-1				NA
CT-8					CT-8				

## NOTES:

All concentrations reported in micrograms per liter (µg/L).  
 Total chromium sample filtered for Well UTM-14; unfiltered for CT-8.  
 u - Not detected, reporting limit shown  
 NA - Not Analyzed  
 J - Organics: result is an estimated value below the reporting limit.  
 B - Inorganics: result is an estimated value below the reporting limit.

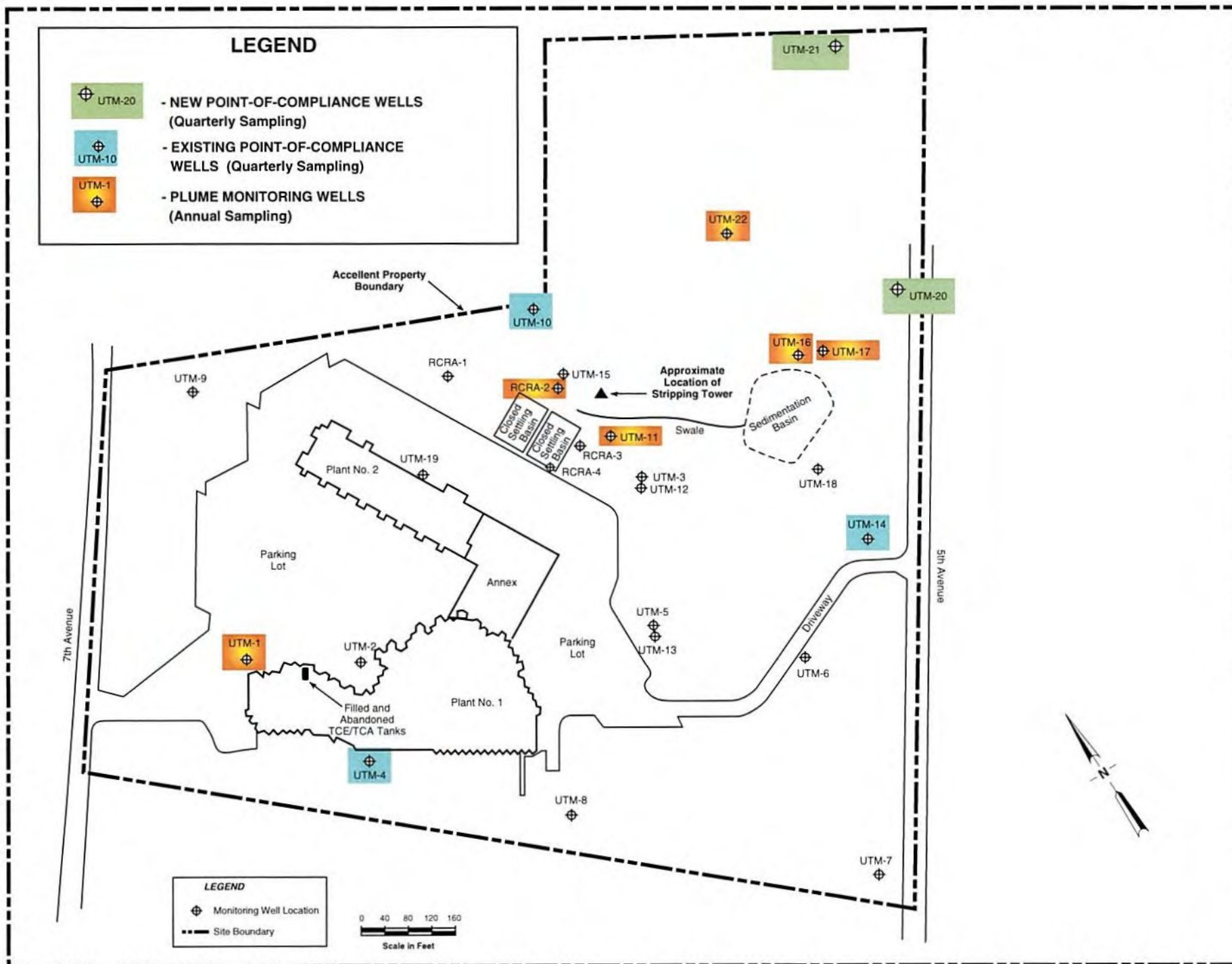


FIGURE 1 ACCELLENT GROUNDWATER MONITORING POINTS, COLLEGEVILLE, PA